

# **Exhibit 11**



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May 17, 2022

BY EMAIL

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**Re:        *In re Tether and Bitfinex Crypto Asset Litig.*,  
              No. 19 Civ. 9236 (KPF) (S.D.N.Y.)**

Dear Kyle:

We write on behalf of Defendants iFinex Inc., BFXNA Inc., BFXWW Inc., Tether Holdings Limited, Tether Limited, DigFinex Inc., Tether Operations Limited, Tether International Limited, Ludovicus Jan van der Velde and Giancarlo Devasini (collectively, the “B/T Defendants”) to follow up on our discussion during the May 11, 2022 meet and confer and to propose a resolution of certain outstanding issues.

**I.        Custodians & Search Terms**

With respect to Plaintiffs’ request to add Stuart Hoegner as a custodian, as we explained in our May 9 letter and discussed on our May 11 call, including

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Mr. Hoegner as a custodian is problematic because, as General Counsel, most of his communications are privileged. You noted during our May 11 call that Mr. Hoegner also communicated with external third parties and that such communications are less likely to be privileged. As a compromise, the B/T Defendants are willing to add Mr. Hoegner as a custodian to the extent that we would include in our document review Mr. Hoegner's communications that include an external third party – *i.e.*, a person or entity other than the B/T Defendants and their respective officers, directors, agents, employees, partners, predecessors, subsidiaries and affiliates.

As we expressed during our May 11 call, the B/T Defendants are disappointed that Plaintiffs have not made a good faith effort to propose search terms that are tailored to the issues in this case or conform to the parties' discussion over the past several months. Plaintiffs' list is eleven pages long, single-spaced, and is primarily comprised of generic words or names. Plaintiffs' proposed search terms plainly are not "narrowly tailored to the relevant subject matter and the underlying claims," as you represented in your May 6 letter.

Attached to this letter is revised list of search terms, along with a redline comparing to the list you sent. The B/T Defendants will use this revised list for the purpose of determining hit counts. To be clear, the inclusion of any search term on this revised list is not a concession that the search term, or any document containing the search term, is relevant to the claims and defenses in this case. The B/T Defendants reserve the right to present further objections to Plaintiffs' proposed search terms.

## **II. Plaintiffs' Requests for Production**

### **RFP 2**

During the May 11 meet and confer, Plaintiffs agreed to the B/T Defendants' proposal in our May 9 letter. Accordingly, the B/T Defendants will produce documents that were produced to the CFTC, DOJ, NYAG and/or SEC that relate to the following topics:

- Reserves, collateral, and backing (fiat or otherwise) of USDT;
- Accounts/financial institutions in which USDT reserves were deposited or held;
- The issuance, authorization, redemption, loaning, gifting, and destruction of USDT by the B/T Defendants, including the amount of USDT issued, authorized, redeemed, loaned, gifted, and destroyed;
- Accounts, wallets, and blockchain addresses owned by the B/T Defendants, including records of all transaction, including withdrawals and deposits;

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- Loans, lines of credit, or agreements for future payment in exchange for USDT involving the B/T Defendants;
- Internal and external audits and reports relating to the use of USDT and USDT reserves and backing;
- Document retention policies and guidelines; and
- Documents and communications relating to other Defendants, Specified Blockchain Addresses, Specified Individuals/Entities, and the Anonymous Trader (as those terms are defined in Plaintiffs' RFPs).

As we have previously discussed, we do not include here any Specified Individuals or Entities that are B/T Defendants or any Specified Blockchain Addresses owned by the B/T Defendants.

### **RFPs 8-10**

RFPs 8-10 request "all communications" between the B/T Defendants and any Individual Defendant, any U.S. Exchange Defendant, and any Crypto Capital Defendant. At the May 11 meet and confer, both parties agreed to consider a compromise that would limit the subject matter of the requested communications to the same topics the parties have agreed to for RFP 2. The B/T Defendants are willing to agree to that compromise.

### **RFP 60**

As we explained during our May 11 call, Plaintiffs' proposed revision of RFP 60 in your May 6 letter still is not tailored in any way to the claims or defenses in this lawsuit, as it continues to seek "[a]ll documents relating to any agreement, contract, understanding, undertaking, or any other relationship, formal or informal" between and among the B/T Defendants, with respect to categories that cover the full range of the B/T Defendants' business activities.

As previously agreed in response to the original RFP 60, the B/T Defendants will produce final written contracts or agreements, to the extent they exist and can be located after a reasonable search, that name a B/T Defendant as a party, on the one hand, and any other Defendant (*i.e.*, Bittrex, Poloniex, Crypto Capital, and/or Reginald Fowler), on the other hand.

### **RFP 61**

The B/T Defendants will produce non-privileged documents, to the extent such documents exist and can be located after a reasonable search, that relate to the B/T Defendants' use of the cryptocommodity exchanges or accounts of any U.S. Exchange Defendant for the transfer of newly issued USDT, either directly or

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indirectly, from Bitfinex to any U.S. Exchange Defendant. For avoidance of doubt, this proposal does not include documents related to transfers of USDT by customers of the B/T Defendants.

**RFP 62**

The B/T Defendants will produce non-privileged documents, to the extent such documents exist and can be located after a reasonable search, that relate to any agreement or arrangement entered into between the B/T Defendants and any U.S. Exchange Defendant relating to the issuance or transfer of new USDT using any cryptocommodity exchanges or accounts owned by any U.S. Exchange Defendant.

**RFP 63**

The B/T Defendants will produce non-privileged documents, to the extent such documents exist and can be located after a reasonable search, that relate to any business strategy, plan, or directive of the B/T Defendants relating to the timing of issuance or transfer of USDT to any U.S. Exchange Defendant for the purchase of cryptocommodities.

**RFPs 64 and 65**

As we noted during our May 11 call, the B/T Defendants continue to object to the scope of RFPs 64 and 65 to the extent they seek communications with cryptocommodity exchanges other than the U.S. Exchange Defendants.

For revised RFP 64, the B/T Defendants will produce non-privileged communications with the U.S. Exchange Defendants, to the extent such documents exist and can be located after a reasonable search, that relate to the issuance or transfer of USDT.

For revised RFP 65, the B/T Defendants will produce non-privileged communications with the U.S. Exchange Defendants, to the extent such documents exist and can be located after a reasonable search, that relate to transfers, collateral, backing, or reserves of USDT.

Best regards,

/s/ Elliot Greenfield

*In re Tether and Bitfinex* Initial Revision of Plaintiffs' Proposed Search Terms  
*Crypto Asset Litigation*

5/17/22

Search Term
Tether w/10 transparency
"conflict of interest" or "conflicts of interest"
(2016 w/15 hack*) and reserve*
"Authorized Tokens"
"don't have enough" w/5 (Tether OR USDT)
"Friedman LLP"
"Noble Markets"
"not 1:1"
"not enough" w/5 (tether or USDT)
"not tethered" OR un-tethered
"Potter Ventures"
"Quantifying the Effect of Tether"
("Tether Authorizer" OR Tether) w/5 authorization
"Tether Report"
("USDT" w/5 (equal* OR equat*)) w/15 (USD OR dollar*)
("White paper" w/15 ("USDT" OR Tether OR token*)) w/15 (equat* OR back* OR equal* OR hold OR dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)
"Bitcoin Really Un-Tethered"
"fully back*" and "fully-back*"
"not backed"
("1:1" OR "one to one") w/15 (Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether)
((Account*) w/15 ("USDT" OR Tether)) w/15 (reserve*)
(Agreement* OR contract*) w/25 (Bittrex OR Polo*)
Urriola OR (Ana w/2 Pan)
((Bolívar w/2 Jose) w/2 Gonzalez) OR (Bolívar w/2 Gonzalez)
(Burn* OR giv* OR destroy*) w/15 ("USDT" OR Tether OR token)
((Document OR email) w/5 (retain or retention)) w/15 (polic* OR procedur* OR complian* OR train* OR Manual)
(Investigat* OR inquir* OR Finding* OR report* OR case* OR audit*) w/15 ("New York AG" OR "New York Attorney General" OR NYAG OR "NY AG" OR "NY Attorney General" OR "Commodities Futures Trading Commission" OR CFTC OR "Department of Justice" OR DOJ OR "Exchange Commission" OR SEC)
(Guarant* OR promis* OR assur*) w/15 ("1:1" OR "one to one" OR "1-1" OR tethered OR redeem* OR exchang*)

(Inflat* OR spik* OR manipul* OR stabiliz* OR floor OR Solven* ) w/15 (bitcoin OR demand OR market* OR customer* OR price* OR valu*)
(Ivan w/2 (Manuel OR Molina OR Lee))
(Print* OR issu* OR creat*) w/15 ("USDT" OR Tether OR token)
(Redeem* OR redempt*) w/5 ("USDT" or Tether OR token)
((Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether) w/15 (equat* OR back* OR equal*)) w/25 (dollar* OR fiat OR currenc* OR reserve*)
(support w/3 price) w/3 (bitcoin OR BTC)
((Tether OR Bitfinex OR Digfinex) w/15 ("Crypto Capital" OR "Global Trade Solutions")) w/25 reserve*
(time OR Coordinat*) w/10 (mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)
1-to-1*
12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P
13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv
15ovrfyRTbhqeUkgAqAwtsCXDASmietmcJ
16tg2RJUEPtZooy18Wxn2me2RhUdC94N7r
17A 16QmavnUfCW11DAApiJxp7ARnxN5pGX
17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye
1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP
1A9AUhKv6aLrKGAdwMM9aHXECZM9uQivZK
1AA6
1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
1AanEM2PU6GS7krwxaysKP3scwb3fdioyE
1CEZ4sjk7MUt3LSJi7bRvzbMZvGLWKCa1G
1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE
1DEcTtkrbdXxS 1wbrMvzub5X4VpByYmAwo
1DUb2YYbQA 1jjaNYzVXLZ7ZioEhLXtbUru
1F6nNgCTLcR4abWuMs 1CHUWYNcnJ47tvbc
1FdZ3iQDDA6mJVoa V4ZcqvVFe1MX97EZoD
1G6jMfQotd6rV8VkmFNx4hPXYHioeBdquf
1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg
1Hi1hyJpUeETGBTQ 8aPZ69GBL8xBVV53XP
1J1d
1J 1dCYzS 5EerUuJCJ6iJYVPytCMVLXrgM9
1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g
1KBXtTQnEgU34xXchwvmAoX7o5qZAp3xF
1LJjvsEN9ZzeBVPB4XbhS7mxg99gBAPoMB
1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb
1MZAayfFJ9Kki2cs oYjF VRKHFF SkdoMLtX
1N52wHoVR79PMDishab2XmRHsbekCdGquK

1NUyryQe1cQYmqg5bjwWNFXA8T1M6htSQ
1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA
1Po1oWkD2LmodfkBYiAktwh76vkF 93LKnh
3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r
Arbitrage
Artific* w/15 (Bitcoin OR “Bitcoin Cash” OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether* OR USDT OR drop* OR crash*)
Back w/5 (tether or USDT)
[Last Name of “Anonymous Trader”]
(Bitfinex w/5 print*) w/5 Tether
Brock w/2 Pierce
Bubble w/15 (bitcoin OR market OR price)
Catastroph* w/15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether* OR USDT OR drop* OR crash*)
(Chris w/2 Ellis) AND (tweet OR twitter)
Conspir* and (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Control* w/15 (pric* OR BTC OR bitcoin OR flow OR Demand OR Market)
Crash* /15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Deceit* w/15 (executive* OR CEO OR director* OR CFO OR Velde OR Arduino OR Devasini OR Warrack OR Potter)
Declin* /15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Demand* w/15 (Bitcoin OR BTC OR Liquid* OR artificial OR appearance)
Disconnect* w/15 (Supply OR Demand)
disrupt* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* )
Downturn* w/15 (Price OR Demand OR Bitcoin OR “Bitcoin Cash” OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Fals* w/15 (supply OR demand OR signal)
Fangorn
Fraud* AND USDT
Freeh w/2 Sporkin
Griffin
Illegal* AND (trad* OR manipul* OR inflat*)
Indict* AND (USDT)
Inflat* AND (Bitcoin OR ether OR crypto*)
Insufficient w/5 (Tether OR USDT)

Loan* w/5 (token OR "USDT" OR Tether)
Manipulat* AND (bitcoin OR ether*) AND USDT
Mint* w/15 ("USDT" OR Tether OR token)
Misrepresent* /15 (asset* OR backing OR reserve OR liquid*)
Monopol*
One-for-one
Oz w/2 Yosef
Peg* w/5 (Tether OR USDT)
Pinchas w/2 (Goldshtein OR Goldstein)
print* w/5 (Tether OR USDT)
Realcoin w/15 (equat* OR back* OR equal*) w/25 (dollar* OR fiat OR currenc* OR reserve* OR cash)
Reserv* w/15 (cash or liquid or currency or sufficient or insufficient or paper or illiquid)
Reserv* w/5 (Tether or USDT)
(Spike* w/15 (demand or trad* OR price)) w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR drop* OR crash*)
Suspicious* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR spike or increase)
Tetherreport.com*
Transfer* w/5 ("USDT" OR Tether)
Un-tether*
Unback*
Unfund*
Untether*

*In re Tether and Bitfinex* Defendants' Redline of Plaintiffs' Proposed Search Terms  
~~5/10/22~~ 5/17/22

*Crypto Asset Litigation*

Search Term
<del>audit w/20 Tether</del>
Tether w/ <del>20</del> <u>10</u> transparency
<del>Conflict*</del> w/5 <del>"conflict of interest" or "conflicts of interest"</del>
(2016 w/15 hack* <del>-OR theft* OR unauthorize* OR transfer* OR stolen</del> ) <u>and reserve*</u>
<del>"ABT &amp; Trust"</del>
<del>260011499</del>
<del>"Bank of America" OR BofA</del>
<del>898100395306</del>
<del>"Bank of Colorado"</del>
<del>5701063413</del>
<del>"Bank of Montreal"</del>
<del>"Bank of New York Mellon" OR "BNY Mellon"</del>
<del>BnkToTheFuture OR "Bnk to the Future"</del>
<del>"Bank of Communications"</del>
<del>"Banco Portuges de Investimento"</del>
<del>"Bank of the Philippine Islands"</del>
<del>2-5486163.306.001</del>
<del>Spoldzielezy</del>
<del>Kaohsiung</del>
<del>230510006385 OR 230509006380</del>
<del>Bankinter</del>
<del>Caixa</del>
<del>0216076478170 OR 0216076477370 OR 0216076476570 OR 0786071416230 OR 0786071414070 OR 0216076111170 OR 0216075956230 OR 0216076490070</del>
<del>"Canadian Imperial Bank of Commerce" OR CIBC</del>
<del>"CC001006882-5108411" OR "CC001006882-0374016" OR "CC001099702-4464710" OR "CC001099702-4113411" OR "CC001099702-4097513" OR</del>
<del>Cathay</del>
<del>33087700408</del>
<del>Citibank OR Citi</del>
<del>207112962 OR 207129503 OR 207132333 OR 206618910 OR 207139809 OR 207139817 OR 207134933 OR 207132325 OR 207134958 OR 42024768923 OR 42001787749 OR 42024769061 OR 57457749 OR 9945530933 OR 207108689</del>
<del>Deltee</del>
<del>"Deutsche Bank"</del>
<del>DE78660700240057016801 OR DE51660700240057016802 OR 192057016802</del>

<del>"First Commercial Bank"</del>
<del>1127599 OR 1235784 OR 1127652 OR 1127644</del>
<del>"First Commercial Bank"</del>
<del>20386001075</del>
<del>Hwatai</del>
<del>3366000005573</del>
<del>"HSBC Bank" OR "HSBC Securities" OR Pershing</del>
<del>861668 OR 141000147</del>
<del>ING</del>
<del>"JP Morgan Chase" OR JPMC OR Chase</del>
<del>296219550 OR 779558365</del>
<del>KGI</del>
<del>018580071208</del>
<del>"Metropolitan Bank"</del>
<del>"Noble Bank"</del>
<del>"Pekao Bank"</del>
<del>"Sackville Bank and Trust"</del>
<del>Santander</del>
<del>00080753 OR 10379431 OR 10446319 OR 10446322</del>
<del>"Shanghai Pudong Development"</del>
<del>"Signature Bank"</del>
<del>"Stearns Bank"</del>
<del>"Sun Trust"</del>
<del>810455498 OR 209364251 OR 1000211769301</del>
<del>"Shin Kong"</del>
<del>0499128110518</del>
<del>Taishin</del>
<del>068760022865</del>
<del>TCA Investment Bancorp &amp; Trust Company</del>
<del>"TD Bank"</del>
<del>4350649188</del>
<del>"US Bank"</del>
<del>"Wells Fargo" OR WF</del>
<del>2514680467</del>
<del>"@bitfinexed"</del>
"Authorized Tokens"
"bank account" w/5 (Tether or USDT)
"Bitcoin Management Solutions"
"Capital International"
"Capital Treasury"

<del>"Celsius Network" or Celsius w/5 (invest* or investment*)</del>
<del>"Ching Shan"</del>
<del>"Crypto Capital" OR "Crypto SP. Z.O.O." or "Crypto SP ZOO" OR "Global Trading Solutions"</del>
<del>"Data Nest"</del>
"don't have enough" w/5 (Tether OR USDT)
<del>"El Salvador" OR Salvadoran</del>
<del>"Eligible Contract"</del>
<del>"End of month" or EOM</del>
<del>"Flash Crash"</del>
"Friedman LLP"
<del>"Galaxy Benchmark"</del>
<del>"Galaxy Digital"</del>
<del>"Global trading"</del>
<del>"Global Transaction Services"</del>
<del>"Hong Kong"</del>
<del>"Julius Baer"</del>
<del>"Jump Trading"</del>
<del>"Master Fund LP"</del>
<del>"Mega International"</del>
<del>"Mt. Gox"</del>
<del>"new Tether"</del>
"Noble Markets"
"not 1:1"
"not enough" w/5 (tether or USDT)
"not tethered" OR un-tethered
<del>"Paradise Papers"</del>
<del>"Paycase Financial"</del>
"Potter Ventures"
<del>"Price differential")</del>
<del>"price wall"</del>
<del>"Prosperity Revenue Merchandising"</del>
"Quantifying the Effect of Tether"
<del>"Schneider Wallace"</del>
<del>"Selendy" OR SG OR SGE</del>
<del>"Shyft Network"</del>
<del>"Smart Property Solutions"</del>
( <del>"Tether Authroizer</del> <a href="#">Authorizer</a> " OR Tether) w/5 <del>authroization</del> <a href="#">authorization</a>
"Tether Report"
( <del>"USDT" w/5 (equal* OR equat*)</del> ) w/15 (USD OR dollar*)
<del>"USDT/USD" w/5 "trading pair"</del>

<del>"Virgin Islands"</del>
<del>(<u>"White paper"</u> w/15 ("USDT" OR Tether OR token*)) <u>w/15</u> (equat* OR back* OR equal* OR hold <del>w/25</del><u>OR</u> dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)</del>
<del>"Willy Report" OR "WillyBot"</del>
<del>"Article 78"</del>
<del>"Bitcoin Really Un-Tethered"</del>
<del>"bitcoin"</del>
<del>"eat and mouse"</del>
<del>"company fund*"</del>
<del>"Crypto Capital"</del>
<del>"fully back*" and "fully-back*"</del>
<del>"Global Trade Solutions" or GTS*</del>
<del>"investor relation*"</del>
<del>"not backed"</del>
<del>"price floor"</del>
<del>"private address*"</del>
<del>"realcoin*"</del>
<del>"Smart Property Solutions" or SPS*</del>
<del>("Class action" OR lawsuit) w/5 (Leibowitz OR Goldshtein OR Tether)</del>
<del>("Off exchange" OR "off exchange" OR private OR "over the counter" or "over the counter" or "OTC")</del>
<del>w/5 (transaction* OR arrangement*)</del>
<del>("Treasury wallet*" OR "Tether treasury") w/15 Bitfinex w/15 (Tether OR "USDT")</del>
<del>("1:1" OR "one to one") w/15 (Stablecoin OR <u>"Stable coin"</u> OR token OR "USDT" OR Tether)</del>
<del>("Know Your Customer" OR "know your customer" OR KYC OR "anti-money laundering" OR AML) w/15 (police* OR procedur* OR complian* OR train OR Manual OR Notice)</del>
<del>((<u>(Account* OR Track* OR monitor* OR maintain*)</u> w/15 ("USDT" OR Tether)) <u>w/15</u> (<del>dollar*</del> OR bank* OR account* OR fiat OR currenc* OR valu* OR reserve* OR balance OR "commercial paper*"))</del>
<del>(Account* OR Track* OR monitor* OR maintain*) w/15 ("USDT" OR Tether) w/15 (issu* OR redeem* OR redemption*)</del>
<del>(Agreement* OR contract*) w/25 (Bittrex OR Polo! OR Bitfinex OR Digfinex OR Tether<del>*</del>)</del>
<del>(Ana w/2 Andrea w/2 Urriola w/2 Pan) OR (Ana w/2 Urriola) OR (Ana w/2 Pan)</del>
<del>((Bolivar w/2 Jose) w/2 Gonzalez) OR (Bolivar w/2 Gonzalez)</del>
<del>(Bump* OR Crash* OR Drop* OR Jump* OR Spike* OR Floor) w/15 (price OR value OR Bitcoin OR BTC)</del>
<del>(Burn* OR giv* OR destroy*) w/15 ("USDT" OR Tether OR token)</del>

(Data OR email) w/5 host* w/15 ( <del>police* OR procedur* OR complian* OR train* OR Manual OR Notice</del> )
((Document OR email) w/5 (retain or retention)) w/15 (police* OR procedur* OR complian* OR train* OR Manual <del>OR Notice</del> )
( <u>Investigat*</u> OR <u>inquir*</u> OR <u>Finding*</u> OR report* OR case* OR audit*) w/15 ( <del>"New York AG"</del> OR <del>"New York Attorney General"</del> OR <del>"NY Attorney General"</del> OR <del>"NY Atty General"</del> OR <del>"NY Att* Gen*"</del> OR NYAG OR "NY AG") or ( <u>OR "NY Attorney General"</u> OR "Commodities Futures Trading Commission" OR "CFTC") or ( <del>"US Dep* of Justice"</del> OR <del>"U.S. Dep* of Justice"</del> OR <del>"Dep* of Justice"</del> OR DOJ) or ( <del>"US Securities Exchange Comm*"</del> OR <del>"U.S. Securities Exchange Comm*"</del> OR <del>"SEC"</del> ) or ( <del>"Securities Commission of the Bahamas"</del> OR <del>"Securities Comm*"</del> ) OR ( <del>"British Virgin Islands Financial Services Comm*"</del> OR <del>"BVI Financial Services Comm*"</del> OR BVI FSC) OR ( <del>"Ontario Securities Comm*"</del> ) OR ( <del>"Superintendencia del Mercado de Valores de Panama"</del> ) OR ( <del>"Comissão do Mercado de Valores Mobiliários"</del> ) OR ( <del>"Seychelles Financial Services Authority"</del> OR <u>"Department of Justice"</u> OR DOJ OR <u>"Exchange Commission"</u> OR SEC)
(Guarant* OR promis* OR assur*) w/15 ("1:1" OR "one to one" OR "1-1" OR tethered OR redeem* OR exchang* <del>w/25 dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash</del> )
( <del>Hamid w/2 Reza</del> ) OR ( <del>Hamid w/2 Khoyi</del> )
(Inflat* <del>OR capitaliz*</del> OR spik* OR manipul* OR stabiliz* OR floor OR <del>return* OR Solven* OR use*</del> ) w/15 ( <u>bitcoin</u> OR demand OR market* OR customer* OR price* OR valu*)
( <del>Investigat* OR inquir*</del> ) w/15 ( <del>"New York Attorney General"</del> OR <del>"NY Attorney General"</del> OR <del>"NY Atty General"</del> OR <del>"NY Att* Gen*"</del> OR NYAG OR "NY AG") or ( <del>"Commodities Futures Trading Commission"</del> OR <del>"CFTC"</del> ) or ( <del>"US Dep* of Justice"</del> OR <del>"U.S. Dep* of Justice"</del> OR <del>"Dep* of Justice"</del> OR DOJ) or ( <del>"US Securities Exchange Comm*"</del> OR <del>"U.S. Securities Exchange Comm*"</del> OR <del>"SEC"</del> ) or ( <del>"Securities Commission of the Bahamas"</del> OR <del>"Securities Comm*"</del> ) OR ( <del>"British Virgin Islands Financial Services Comm*"</del> OR <del>"BVI Financial Services Comm*"</del> OR BVI FSC) OR ( <del>"Ontario Securities Comm*"</del> ) OR ( <del>"Superintendencia del Mercado de Valores de Panama"</del> ) OR ( <del>"Comissão do Mercado de Valores Mobiliários"</del> ) OR ( <del>"Seychelles Financial Services Authority"</del> )
(Ivan w/2 ( <u>Manuel w/2</u> OR <u>Molina w/2</u> OR <u>Lee</u> ) OR ( <del>Ivan w/2 Molina</del> ) OR ( <del>Ivan w/2 Lee</del> )
( <del>mov* OR manipul*</del> ) w/10 ( <del>price OR Market</del> )
(Print* OR issu* OR creat*) w/15 ("USDT" OR Tether OR token)
( <del>Raise* OR request*</del> ) w/5 ( <del>prospectus* OR "private placement"</del> OR PPM OR <del>solicit* OR</del>
(Redeem* OR redempt*) w/15 ( <u>5</u> ("USDT" or Tether OR token)
((Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether) w/15 (equat* OR back* OR equal* <del>OR hold*</del> ) w/25 (dollar* OR <del>bank* OR account* OR fiat</del> OR currenc* OR <del>valu* OR reserve*</del> )

(support w/3 price) w/3 (bitcoin OR BTC)
((Tether OR Bitfinex OR Digfinex) w/15 ("Crypto Capital" OR "Global Trade Solutions")) w/25 <del>process* OR operat* OR manag* OR transact* OR fiat* OR curren</del> reserve*
(time OR Coordinat*) w/10 (mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)
<del>(Track* OR monitor* OR maintain* w/15 polic* OR procedur* OR process* OR "manual process")</del>
<del>w/15 ("USDT" OR Tether</del>
<del>(USDT OR Tether) w/5 address* w/15 (Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)</del>
@bitfinex
@brockpierce
1-to-1*
12cgpFdJVIXbwHbhrA3TuW1EGnL25Zqc3P
13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv
15ovrfyRTbhqeUkgAqAwtscXDASmietmcJ
16tg2RJUEPtZooy18Wxn2me2RhUdC94N7r
17A 16QmavnUfCW11DAApiJxp7ARnxN5pGX
17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye
<del>19-cv-09236*</del>
<del>19-me-00022*</del>
1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP
1A9AUhKv6aLrKGAdwMM9aHXECZM9uQivZK
1AA6
1AA6iP6hrZfYiacfzb3VS5JoyKeZZBEYRW
1AanEM2PU6GS7krwxaysKP3scwb3fdioyE
1CEZ4sjk7MUt3LSJi7bRvvbMZvGLWKCa1G
1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE
1DEcTtkrbdXxS 1wbrMvzub5X4VpByYmAwo
1DUb2YYbQA 1jjaNYzVXLZ7ZioEhLXtbUru
1F6nNgCTLcR4abWuMs 1CHUWYNcnJ47tvbc
1FdZ3iQDDA6mJVoa V4ZcqgVFe1MX97EZoD
1G6jMfQotd6rV8VkMFNx4hPXYHioeBdquf
<del>1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh</del>
1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg
1Hi1hyJpUeETGBTQ 8aPZ69GBL8xBVV53XP
1J1d
1J 1dCYzS 5EerUuJCJ6iJYVPytCMVLXrgM9
1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g
1KBXtTQnEgU34xXchwvmAoX7o5qZAp3xF
<del>1Kr6QSydW9bFQG 1mXiPNNu6WpJGmUa9i1g</del>

<del>1KYiKJEfdJtap9QX2v9BXJMpZ2SfU4pgZw</del>
1LJvsEN9ZzeBVPB4XbhS7mxg99gBAPoMB
1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb
1MZAayfFJ9Kki2cs oYjF VRKHFF SkdoMLtX
1N52wHoVR79PMDishab2XmRHsbekCdGquK
<del>1NTMakegVwQpMdGxRQnFKyb3G-1FAJys-Sfz</del>
1NUyryQelcQYmqg5bjwWNFXA8T1M6htSQ
1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA
1PoIoWkD2LmodfkBYiAktwh76vkF 93LKnH
<del>20-mc-00063*</del>
<del>20-mc-00446*</del>
<del>20-mi-00042*</del>
<del>20-ms-00033*</del>
<del>3BbDtxBSjgfTRxaBUgR2JACWRukLKtZdiQ</del>
3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r
<del>3MbYQMMmSkC3AgWkj9FMo5LsPTW1zBTwXL</del>
<del>Adam w/2-Chamely</del>
<del>agree w/15 (flow OR USDT OR Tether OR mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)</del>
<del>AML</del>
<del>Amy w/2-Churchill</del>
<del>Anti-money</del>
Arbitrage
<del>Aron w/2-Camponovo</del>
Artific* <u>w/15</u> (Bitcoin OR “Bitcoin Cash” OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether!*_ OR USDT OR drop!*_ OR crash!*_)
<del>Audit*</del>
Back w/5 (tether or USDT)
<del>Backfill*</del>
<del>Berda [Last Name of “Anonymous Trader”]</del>
<del>Betts</del>
<del>Binance</del>
<del>Binance</del>
<del>Biteointalk*</del>
<u>(Bitfinex w/5 print*)</u> w/5 Tether
<del>Bitfinex'ed</del>
<del>Bitlicense</del>
<del>Bittrex</del>
<del>Bjorn w/3-Wolf</del>
<del>Bloat*</del>

<del>Blockchain.com</del>
<del>Blockchain.info*</del>
<del>Brock</del>
Brock w/2 Pierce
<del>Bubble</del>
<del>Bybit</del>
<del>callBubble</del> w/ <del>3</del> 15 ( <del>me</del> bitcoin OR <del>you</del> market OR price)
Catastroph* <u>w</u> /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! <u>*</u> OR USDT OR drop! <u>*</u> OR crash! <u>*</u> )
<del>CC</del>
<del>CCC</del>
<del>CEA</del>
<del>CFTC</del>
(Chris w/2 Ellis) <u>AND</u> (tweet OR twitter)
<del>CoinAPI</del>
<del>Coinbase</del>
<del>Coindesk</del>
<del>CoinDesk*</del>
<del>Coinmarketeap.com*</del>
<del>Commingl*</del>
<del>Commission*</del>
Conspir* and (Bitcoin OR <del>Bitcoin OR Bitcoin Cash OR</del> BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* <del>OR Tether*</del> )
Control* w/15 (pric* OR BTC OR bitcoin OR flow OR Demand OR Market)
<del>Control* w/15 Bitfinex w/15 (Tether OR "USDT")</del>
Crash* /15 (Bitcoin OR <del>Bitcoin Cash OR</del> BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* <del>OR Tether! OR USDT OR drop! OR crash!</del> )
<del>Crypto.com</del>
<del>Crypto* w/15 future*</del>
<del>CryptoCapital</del>
<del>D'Amico</del>
<del>Daniel w/2 Barrs</del>
<del>Dash*</del>
<del>Debas*</del>
Deceit* <u>w</u> /15 (executive! <u>*</u> OR CEO OR director! <u>*</u> OR CFO OR Velde OR Ardoino OR Devasini OR Warrack OR <del>Bitfinex! OR</del> Potter)
Declin* /15 (Bitcoin OR <del>Bitcoin Cash OR</del> BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* <del>OR Tether! OR USDT OR drop! OR crash!</del> )
<del>Defraud*</del>
<del>Delist*</del>

Demand* <u>w/15</u> (Bitcoin OR BTC OR <del>Omni OR Eth* OR Tron OR EOS OR Liquid* OR Tether!</del> <u>artificial</u> OR <del>USDT OR artificial or</del> appearance)
<del>Destroy* OR Destruct*</del>
<del>DFS</del>
Disconnect* w/15 (Supply <del>or</del> <u>OR</u> Demand)
disrupt* <u>w/15</u> (Bitcoin OR <del>Bitcoin-Cash OR</del> BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* <del>OR Tether! OR USDT OR drop! OR crash!</del> )
<del>DOJ</del>
Downturn* <u>w/15</u> (Price OR Demand OR Bitcoin OR <u>"Bitcoin Cash"</u> OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* <del>OR Tether! OR USDT</del> )
<del>Drop* /15 (Price OR Demand OR Bitcoin OR Bitcoin-Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR</del>
<del>Epay* /15 (Bitcoin OR Bitcoin-Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)</del>
<del>Ethereum* AND USDT</del>
<del>EURT*</del>
Fals* <u>w/15</u> (supply <del>or</del> <u>OR</u> demand <del>or</del> <u>OR</u> signal)
Fangorn
<del>Fines /15 (regulat* or FTC or "Attorney General" or CFTC)</del>
<del>Fowler*</del>
Fraud* AND USDT
Freeh w/2 Sporkin
<del>FTX</del>
<del>Gemini</del>
<del>Gerald w/2 Martinez</del>
<del>Giancarlo OR Devasini</del>
Griffin
<del>Hack*</del>
<del>Heisenberg</del>
<del><a href="https://tether.to/en/tether-update">https://tether.to/en/tether-update</a></del>
<del><a href="https://tether.to/en/transparency">https://tether.to/en/transparency</a></del>
<del><a href="https://tether.to/faqs/">https://tether.to/faqs/</a></del>
<del>Huobi</del>
<del>Huobi</del>
<del>Hwatai</del>
Illegal* AND (trad* OR manipul* OR inflat*)
Indict* AND ( <del>crypto*</del> OR USDT)
Inflat* AND (Bitcoin <u>OR</u> ether <u>OR</u> crypto*)
Insufficient w/5 (Tether OR USDT)
<del>Investigat!</del>

<del>IOU</del>
<del>Jail</del>
<del>Kraken</del>
<del>Kraken</del>
<del>KuCoin</del>
<del>Launder*</del>
<del>Leibowitz</del>
<del>Liquid* and Illiquid* OK TO ELIMINATE</del>
<del>Litecoin*</del>
<del>Loan</del>
<del>Loan AND USDT</del>
Loan* w/15 (token OR "USDT" OR Tether)
<del>LOC</del>
<del>Ludovicius OR Velde</del>
Manipulat* AND (bitcoin OR ether!*) AND USDT
<del>MC-20-00018*</del>
<del>Merlin*</del>
<del>MEXC</del>
<del>Michael w/2 Novogratz</del>
Mint* w/15 ("USDT" OR Tether OR token)
Misrepresent* /15 (asset* <del>or</del> OR backing <del>or</del> OR reserve <del>or</del> OR liquid*)
<del>Monero*</del>
Monopol*
<del>New w/5 (Tether OR USDT)One-for-one</del>
<del>Necoin*</del>
<del>OKEx</del>
<del>Oliver w/2 Camponovo</del>
<del>Omniexplorer.info*</del>
<del>One-for-one</del> Oz w/2 Yosef
<del>Org* w/5 (chart OR structure)</del>
<del>Oz w/2 Yosef</del>
Peg* w/5 (Tether OR USDT)
Pinchas w/2 (Goldshtein OR Goldstein)
<del>Poloniex</del>
<del>Ponzi</del>
<del>Potter*</del>
<del>Print w/3 money</del>
<del>print* w/5 (Tether or USDT)</del>
<del>prop* w/3 up*</del>
<del>Pump*</del>

<del>Purchas</del> <u>print</u> * w/5 (Tether OR USDT)
Realcoin w/15 (equat* OR back* OR equal*) w/25 (dollar* OR <del>bank*</del> <del>OR account*</del> <del>OR fiat</del> OR currenc* OR reserve* OR cash)
<del>Reggie OR Reginald OR Fowler</del>
<del>Releas*</del> w/5 ( <del>Tether OR USDT</del> )
Reserv* <u>w/15</u> (cash or liquid or currency or sufficient or insufficient or paper or illiquid)
Reserv* w/5 (Tether or USDT)
<del>Roche OR RCF OR RF</del>
<del>Seam*/15 (USDT or Tether)</del>
<del>SEC</del>
<del>SkYROCKET*</del>
( <u>Spike*</u> <u>w/15</u> (demand or trad* OR price- <del>or</del> )) <u>w/15</u> (Bitcoin <del>OR Bitcoin Cash</del> OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR <del>Tether!</del> <del>OR USDT</del> <del>OR drop!</del> <del>OR crash!</del> <del>OR</del> )
<del>Spoldzielezy</del>
Suspicious* <u>w/15</u> (Bitcoin OR <del>Bitcoin Cash</del> <del>OR</del> BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR <del>Tether!</del> <del>OR USDT</del> <del>OR</del> spike or increase)
<del>Tether w/2 (Pull* OR Push*)</del>
<del>Tether*</del> w/3 (" <del>Bank Account</del> ")
tetherreport <u>Tetherreport</u> .com*
<del>Tokenised or tokenized</del>
<del>TOPSUN</del>
<del>Trade*</del> w/5 ( <del>Strategy OR Pattern</del> )
Transfer* w/ <del>15</del> <u>5</u> (" <del>USDT</del> " OR Tether <del>OR token</del> )
<del>Transparen*</del>
Un-tether*
<del>Unauthorize*</del>
Unback*
<del>Undisclos */15 (relationship or connection or tie* or arrangement)</del>
Unfund*
<del>Unilateral</del> <u>Untether</u> *
<del>Unpredictabl*</del>
<del>Untether*</del> <del>UpBit</del> <del>Wash</del> <del>Whalepool*</del> <del>XT.com</del> <del>Zeash*</del>